# ORIGINAL

# **OPEN MEETING**



MEMORANDUM

RECEIVED

Arizona Corporation Commission

**DOCKETED** 2016 JUN 28 A 9 34

TO:

THE COMMISSION

JUN 2 8 2016

AZ CORP COMMISSION

FROM:

**Utilities Division** 

DOCKETED BY

DOCKET CONTROL

DATE:

June 28, 2016

RE:

IN THE MATTER OF THE APPLICATION OF QWEST CORPORATION DBA CENTURYLINK QC FOR APPROVAL OF A TARIFF REVISION TO **GRANDFATHER** THE CENTURYLINK **MEDICALLY** NEEDY TELEPHONE ASSISTANCE PROGRAM TO EXISTING CUSTOMERS AND NO NEW CUSTOMERS BE ACCEPTED INTO THE PROGRAM EFFECTIVE

APRIL 1, 2017 (DOCKET NO. T-01051B-16-0092)

#### A. INTRODUCTION.

On March 14, 2016, Qwest Corporation dba CenturyLink QC ("CenturyLink" or "Company") filed an Application for a tariff revision to change the availability of the Telephone Assistance Plan for the Medically Needy ("TAP for the Medically Needy"), which was established by the Arizona Corporation Commission ("Commission") in Decision No. 57462 (July 15, 1991). In its Application, CenturyLink seeks Commission approval to stop offering the program to new customers effective April 1, 2017. Customers already enrolled in the program as of April 1, 2017, would be grandfathered and would continue receiving the credit as long as they recertify annually and do not leave the program for any reason. New or prospective customers will have almost a year in which to enroll before the program is discontinued.

The Commission's Utilities Division Staff ("Staff") recommends approval of CenturyLink's proposed tariff revision which would grandfather existing TAP for the Medically Needy customers as of April 1, 2017; and also provide for discontinuance of the program to new customers as of that date.

#### В. **BACKGROUND**

The TAP for the Medically Needy was first established by the Commission in Decision No. 57462 on July 15, 1991. The TAP for the Medically Needy allows low income customers demonstrating a special medical need to obtain home phone service from CenturyLink at little or no charge. Until recently, the program was administered by the Arizona Department of Economic Security ("DES"). Community Action Agencies throughout the state assisted the DES in enrolling qualified applicants in the TAP. DES provided both administrative and direct services by conducting training, customer service, data-entry, and outreach activities. The Community Action Agencies provided case management services to low-income customers and coordinated application intake systems, conducted client interviews and determined client eligibility.

In a communication dated May 25, 2016, CenturyLink notified Staff that it has taken over the administration of its TAP for the Medically Needy, Senior Telephone Discount Program and Lifeline Program from DES. In 2014, DES advised CenturyLink that their existing IT platform was no longer going to be funded or receive support. After considering various options, CenturyLink decided to administer the program itself. CenturyLink stated that it developed a transition plan with DES to transfer administration of the program to CenturyLink. In March of this year, DES began to phase the program functions to CenturyLink and for the most part completed the transition earlier this month.

In Decision No. 68604 issued on March 23, 2006, the Commission increased the funding for the TAP for the Medically Needy from a total of \$1.0 million annually to \$2.0 million annually, exclusive of any federal funding received. Decision No. 68604 also required that \$100,000 of this amount be used annually to offset the reasonable administrative costs incurred by Community Action Agencies in enrolling qualified applicants in TAP for the Medically Needy program. The Decision also required that any unused Medically Needy TAP funds in any given year remain in the account for use in subsequent years. Medically Needy TAP expenditures are capped at the \$2.0 million annual funding level unless the account has a surplus from prior years. In the event the account has a surplus from prior years and there are additional qualified applicants, Medically Needy TAP expenditures may exceed the annual funding level.

On December 12, 2015, in Decision No. 75357, the Commission approved CenturyLink's proposed tariff revisions to change the accounting methodology for the TAP for the Medically Needy, by eliminating the \$2 million annual set-aside requirement and instead allowing the Company to fund the program as an in-year operating expense. This change became effective January 1, 2016. Decision No. 75357 also approved CenturyLink's request to reverse the accounting liability consisting of the set-aside balance of unused TAP for the Medically Needy funds on the Company's books. It also eliminated the \$2.0 million cap on future TAP for the Medically Needy funding effective January 1, 2016; and required the Company to continue to provide TAP for the Medically Needy credits to both new and existing customers who are determined by DES to be eligible.

CenturyLink has given advance notice of the proposed changes to its tariff to all existing Medically Needy TAP customers, the Community Action Agencies throughout the state, DES and all parties on the service list in Docket No. T-01051B-03-0454 et al. since the funding requirement for TAP was part of a Settlement Agreement approved in Decision No. 68604 in that Docket.

Two individuals filed Opinions with Commission's Consumer Services Section opposing CenturyLink's proposed phase-out of the TAP for the Medically Needy program.

#### C. STAFF ANALYSIS

The TAP for the Medically Needy program was instituted by the Conmission in 1991 at a time when US West (a predecessor company of CenturyLink QC) was essentially a monopoly provider of telephone service in its territory. The program is only available to CenturyLink customers and is not offered by any other providers or in areas outside of CenturyLink's service territory.

At the peak of the program's popularity in 2002, there were over 10,000 customers enrolled in the program. Since then, the number has declined. At the end of 2014, less than 3,000 customers participated in TAP for the Medically Needy. The most recent subscribership levels obtained from the Company indicates that only 2,200 customers currently are enrolled. According to the Company, this is a reflection in part of the changing telecommunications marketplace. The telecommunications market is much more competitive with various forms of technology available to residential and business customers. Various alternative means of communicating such as wireless, cable telephony, internet and VoIP are now available to customers. According to CenturyLink, approximately 71 percent of the voice connections in Arizona are served by wireless providers and over 41 percent of Arizona individuals 18 and older lived in households that are wireless only.

CenturyLink states that the proposed tariff change will have no impact on the availability of funds for the program. The Company will continue to provide benefits to all current customers, as well as any new customers who enroll in the program prior to April 1, 2017. After that date, no new customers will be accepted and customers who leave the program for any reason, such as failure to re-qualify, failure to recertify, or a lapse in service, will not be accepted back into the program. After April 1, 2017, customers who formerly qualified for the program will still be eligible for the Lifeline Program and if over the age of 65, for the Senior Telephone Discount Program, both of which offer subsidies for basic local telephone service. Customers also have the option of obtaining free or subsidized wireless service from numerous providers throughout the community based on eligibility.

As discussed above, CenturyLink has taken over administration of these programs with the transition to CenturyLink starting in March of this year. After learning of this, on May 27, 2016, Staff sent CenturyLink several data requests regarding the transition and how that would affect its Application in this docket. Staff's data requests asked for information on DES' inability to administer the program due to the change in IT platform¹; the training provided to CenturyLink's inhouse staff that will be administering the program; information on the \$100,000 disbursement to the Community Action Agencies required by Decision No. 68604; a copy of the transition plan with DES; and any planned outreach efforts prior to grandfathering of the program. CenturyLink responded to Staff's data requests on June 1, 2016.

In brief, CenturyLink provided copies of its email exchanges with DES on the topic of program administration in the future given IT constraints and the need to consider alternatives. With DES' concerns regarding continued administration of the program due to IT constraints, the Company considered several other options including "off the shelf" or "turnkey" software programs that could be used instead of the current IT solution being utilized by DES and third party administration. Ultimately, it is Staff's understanding that the software didn't meet the necessary specifications for use and that the Company concluded that third party administration would not be cost effective. CenturyLink administers the TAP programs in many of its states, and overall it was determined that it would be less expensive for CenturyLink to administer the programs itself rather than go with a third party provider. It indicated that its Lifeline representatives are trained to handle Lifeline/TAP programs for 32 other states in addition to Arizona. Although there may be minor

<sup>&</sup>lt;sup>1</sup> It is Staff's understanding that CenturyLink will administer all three programs in the future that DES had previously administered including the TAP, the Senior Telephone Discount Program and the Lifeline Program.

differences between states, the programs are all substantially similar and follow comparable processes according to CenturyLink. CenturyLink provided Staff with information on the employee training programs it will use to familiarize employees with the various programs so they can respond to customer inquiries. Staff was told by the Company that DES and the Community Action Agencies have been instructed to refer eligible customers to CenturyLink for inclusion in the program up to April 1, 2017, and have been provided with the necessary information to do so.

In response to Staff's questions on planned outreach efforts prior to April 1, 2017, the Company states that it will utilize various methods to make customers aware of the program while it is still enrolling new customers. First, information on TAP for the Medically Needy, is available on the Company's website at <a href="www.centurylink.com/lifeline">www.centurylink.com/lifeline</a>. Second, CenturyLink states it has and will continue to send out an annual bill notice with information about TAP and has included information in the Call Guide Pages of its Directory. The Company states that all of these outreach efforts will continue for as long as the program is available to new customers. In addition to the previous notice, CenturyLink states that upon approval of this filing by the Commission, the Company will notify its entire residential customer base that the program is being discontinued on April 1, 2017. Upon approval by the Commission, CenturyLink will notify all customers of the changes to the program though a bill insert and will also send a notice of the changes in the recertification letters which are sent annually to all existing TAP customers. Staff believes the planned outreach efforts by the Company are reasonable. However, Staff believes that the Company should continue to do at least one outreach effort a year informing all residential customers of the availability of the Lifeline and Senior Telephone Discount Programs.

In Decision No. 68604, \$100,000 was to be allocated to the Community Action Agencies to defer their expenses associated with assisting DES in administering the TAP for the Medically Needy program. According to CenturyLink, the \$100,000 disbursement to the Community Action Agencies was to reimburse them for their costs to enroll qualified applicants based upon the number of TAP applications each agency has processed in the quarter. Although as CenturyLink points out, that disbursement methodology was revised in Decision No. 70489 to allow the use of existing DES funding formula that was not directly tied to the number of TAP applications processed to simplify the methodology for DES. Nonetheless, according to CenturyLink it did not change the intent behind the \$100,000 which was to provide an "offset' to the administrative costs for the program. CenturyLink points out that the disbursement is made on a state fiscal year basis - July 1st through June 30th of each year. Since CenturyLink has provided reimbursement through June 30th, the Company states that the most that could be argued is that CenturyLink would be responsible for \$75,000 in further funding until the program is grandfathered. In the materials provided by CenturyLink, at the request of Staff, the Company had reached out to DES and the Community Action Agencies on this issue. Because the Company will continue to process new customers through April 1, 2017, CenturyLink should work with DES and the Community Action Agencies to address any further funding needs up to \$75,000 for the next state fiscal year until the program is grandfathered.

Finally, when DES was the administrator of the program, it published quarterly reports with information including subscribership levels. Since CenturyLink will now be administering the program in lieu of DES, Staff believes that it would be useful for CenturyLink to file quarterly

reports with information on the various programs as discussed in Staff's recommendations below. Staff believes the reporting should be quarterly to begin with; and then can transition to annual filings.

### D. STAFF RECOMMENDATIONS

Based on its analysis, Staff concludes that CenturyLink's request, for approval to grandfather the Medically Needy Telephone Assistance Program to existing customers as of April 1, 2017, is reasonable. In addition, CenturyLink's proposal to make the program available to new applicants until April 1, 2017, is also reasonable. The program will not be offered to new customers after April 1, 2017.

Staff further recommends that the Company be required to perform outreach efforts to customers meeting eligibility requirements, but who have not yet signed up for the TAP for the Medically Needy program as of April 1, 2017, as discussed above. In addition, the Company shall continue to do at least one outreach effort a year which informs all residential customers of the availability of the Lifeline and Senior Telephone Discount Program.

Staff recommends that CenturyLink confer with DES and the Community Action Agencies and come to agreement on necessary funding up to a cap of \$75,000 to support the agencies work on these programs through April 1, 2017 of the next state fiscal year.

Finally, Staff further recommends that CenturyLink take over the quarterly reporting done by DES, as program administrator. Staff recommends that CenturyLink file quarterly reports for a period of two years from the date of the Commission's Order on this matter which includes any problems encountered by CenturyLink since taking over administration of its TAP programs in Arizona; any continued funding provided to DES and the Community Action Agencies; the level of subscribership by program; quarterly and cumulative costs of administering the program, any outreach efforts undertaken for the TAP for the Medically Needy and the other TAP programs, and any other reporting requirements requested by Staff. After the two year period, Staff recommends that the Company file reports on an annual basis with information on subscription levels.

Thomas M. Broderick

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Director

**Utilities Division** 

TMB: BNC:red\MAS

Originator: Blessing Chukwu

#### 1 BEFORE THE ARIZONA CORPORATION COMMISSION 2 DOUG LITTLE Chairman **BOB STUMP** 3 Commissioner **BOB BURNS** 4 Commissioner TOM FORESE 5 Commissioner 6 ANDY TOBIN Commissioner 7 8 IN THE MATTER OF THE APPLICATION ) DOCKET NO.T-01051B-16-0092 OF QWEST CORPORATION DBA 9 CENTURYLINK QC FOR APPROVAL OF A DECISION NO. TARIFF REVISION TO GRANDFATHER 10 THE CENTURYLINK MEDICALLY NEEDY TELEPHONE ASSISTANCE <u>ORDER</u> 11 PROGRAM TO EXISTING CUSTOMERS AND NO NEW CUSTOMERS BE 12 ACCEPTED INTO THE PROGRAM 13 EFFECTIVE APRIL 1, 2017.

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Open Meeting
July 12 and 13, 2016

Phoenix, Arizona

BY THE COMMISSION:

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## **FINDINGS OF FACT**

#### A. Introduction

1. On March 14, 2016, Qwest Corporation dba CenturyLink QC ("CenturyLink" or "Company") filed an Application for a tariff revision to change the availability of the Telephone Assistance Plan for the Medically Needy ("TAP for the Medically Needy"), which was established by the Arizona Corporation Commission ("Commission") in Decision No. 57462 (July 15, 1991). In its Application, CenturyLink seeks Commission approval to stop offering the program to new customers effective April 1, 2017. Customers already enrolled in the program as of April 1, 2017, would be grandfathered and would continue receiving the credit as long as they recertify annually and do not leave the program for any reason. New or prospective customers will have almost a year in which to enroll before the program is discontinued.

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#### В. Background

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6 3. The TAP for the Medically Needy was first established by the Commission in Decision No. 57462 on July 15, 1991. The TAP for the Medically Needy allows low income customers 7 8 demonstrating a special medical need to obtain home phone service from CenturyLink at little or no 9 charge. Until recently, the program was administered by the Arizona Department of Economic Security ("DES"). Community Action Agencies throughout the state assisted the DES in enrolling 10 11 qualified applicants in the TAP. DES provided both administrative and direct services by conducting 12 training, customer service, data-entry, and outreach activities. The Community Action Agencies provided case management services to low-income customers and coordinated application intake 13 14 systems, conducted client interviews and determined client eligibility.

For the reasons discussed below, the Commission's Utilities Division Staff ("Staff")

recommends approval of CenturyLink's proposed tariff revisions which would grandfather existing

TAP for the Medically Needy customers as of April 1, 2017; and also provide for discontinuance of

the Medically Needy TAP program to new customers as of that date.

- 4. In a communication dated Mary 25, 2016, CenturyLink notified Staff that it had taken over the administration of its TAP for the Medically Needy, Senior Telephone Discount Program and Lifeline Program from DES. In 2014, DES advised CenturyLink that their existing IT platform was no longer going to be funded or receive support. After considering other options, CenturyLink decided to administer the program itself. CenturyLink stated that it developed a transition plan with DES to transfer administration of the program to CenturyLink. In March of this year DES began to phase the program functions to CenturyLink and for the most part completed the transition earlier this month.
- 5. In Decision No. 68604 issued on March 23, 2006, the Commission increased the funding for the TAP for the Medically Needy from a total of \$1.0 million annually to \$2.0 million annually, exclusive of any federal funding received. Decision No. 68604 also required that \$100,000 of this amount be used annually to offset the reasonable administrative costs incurred by Community Action Agencies in enrolling qualified applicants in the TAP for the Medically Needy program. The Decision also required that any unused Medically Needy TAP funds in any given year remain in the

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 account for use in subsequent years. Medically Needy TAP expenditures are capped at the \$2.0 million annual funding level unless the account has a surplus from prior years. In the event the account has a surplus from prior years and there are additional qualified applicants, Medically Needy TAP expenditures may exceed the annual funding level.

- 6. On December 12, 2015, in Decision No. 75357, the Commission approved CenturyLink's proposed tariff revisions to change the accounting methodology for the TAP for the Medically Needy, by eliminating the \$2 million annual set-aside requirement and instead allowing the Company to fund the program as an in-year operating expense. This change became effective January 1, 2016. Decision No. 75357 also approved CenturyLink's request to reverse the accounting liability consisting of the set-aside balance of unused TAP for the Medically Needy funds on the Company's books. It also eliminated the \$2.0 million cap on future TAP for the Medically Needy funding effective January 1, 2016; and required the Company to continue to provide TAP for the Medically Needy credits to both new and existing customers who are determined by DES to be eligible.
- 7. CenturyLink has given advance notice of the proposed changes to its tariff to all existing Medically Needy TAP customers, the Community Action Agencies throughout the state, DES and all parties on the service list in Docket Nos. T-01051B-03-0454 et al. since the funding requirement for TAP was part of a Settlement Agreement approved in Decision No. 68604 in that Docket.
- 8. Two individuals filed Opinions with the Commission's Consumer Services Section opposing CenturyLink's proposed phase-out of the TAP for the Medically Needy program.

# C. Staff Analysis

- 9. The TAP for the Medically Needy program was instituted by the Commission in 1991 at a time when US West (a predecessor company of CenturyLink QC) was essentially a monopoly provider of telephone service in its territory. The program is only available to CenturyLink customers and is not offered by any other providers or in areas outside of CenturyLink's service territory.
- 10. At the peak of the program's popularity in 2002, there were over 10,000 customers enrolled in the program. Since then, the number has declined. At the end of 2014, less than 3,000 customers participated in TAP for the Medically Needy. The most recent subscribership levels

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obtained from the Company indicates that only 2,200 customers currently are enrolled. According to the Company, this is a reflection in part of the changing telecommunications marketplace. The telecommunications market is much more competitive with various forms of technology available to residential and business customers. Various alternative means of communicating such as wireless, cable telephony, internet and VoIP are now available to customers. According to CenturyLink, approximately 71 percent of the voice connections in Arizona are served by wireless providers and over 41 percent of Arizona individuals 18 and older lived in households that are wireless only.

- CenturyLink states that the proposed tariff changes will have no impact on the availability of funds for the program. The Company will continue to provide benefits to all current customers, as well as any new customers who enroll in the program prior to April 1, 2017. After that date, no new customers will be accepted and customers who leave the program for any reason, such as failure to re-qualify, failure to recertify, or a lapse in service, will not be accepted back into the program. After April 1, 2017, customers who formerly qualified for the program will still be eligible for the Lifeline Program and if over the age of 65, for the Senior Telephone Discount Program, both of which offer subsidies for basic local telephone service. Customers also have the option of obtaining free or subsidized wireless service from numerous providers throughout the community based on eligibility.
- 12. As discussed above CenturyLink has taken over administration of these programs with the transition to CenturyLink starting in March of this year. After learning of this, on May 27, 2016, Staff sent CenturyLink several data requests regarding the transition and how that would affect its Application in this docket. Staff's data requests asked for information on DES' inability to administer the program due to the change in IT platform; the training that will be provided to CenturyLink's inhouse staff who are charged with administering the program; information on the \$100,000 disbursement to the Community Action Agencies required by Decision No. 68604; a copy of the transition plan with DES, and any planned outreach efforts prior to grandfathering of the program. CenturyLink responded to Staff's data requests on June 1, 2016.
- program administration in the future given IT constraints and the need to consider alternatives. With

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DES' concerns regarding continued administration of the program due to its IT constraints, the Company considered several other options including "off the shelf" or "turnkey" software programs that could be used instead of the current IT solution being utilized by DES and third-party administrators. Ultimately, it is Staff's understanding that the software didn't meet the necessary specifications for use and that the Company concluded that third party administration would not be cost effective.

- 14. CenturyLink administers the TAP programs in many of its states, and overall it was determined that it would be less costly for CenturyLink to administer the programs itself rather than go with a third party provider. The Company indicated that its Lifeline representatives are trained to handle Lifeline/TAP programs for 32 other states in addition to Arizona. Although there may be minor differences between states, the programs are all substantially similar, and follow comparable processes according to CenturyLink. CenturyLink provided Staff with information on the employee training programs it will use to familiarize employees with the various programs so they can respond to customer inquiries. Staff was told by the Company that DES and the Community Action Agencies have been instructed to refer eligible customers to CenturyLink for inclusion in the program up to April 1, 2017, and have been provided with the necessary information to do so.
- 15. In response to Staff's questions on planned outreach efforts prior to April 1, 2017, the Company states that it will utilize various methods to make customers aware of the program while it is still enrolling new customers. First, information on TAP for the Medically Needy program is available on the Company's website at <a href="https://www.centurylink.com/lifeline">www.centurylink.com/lifeline</a>. Second, the Company states it has and will continue to send out an annual bill notice with information about the TAP and has included information in the Call Guide Pages of its Directory. The Company states that all of these outreach efforts will continue for as long as the program is available to new customers. In addition to the previous notice, CenturyLink states that upon approval of this filing, by the Commission the Company will notify its entire residential customer base that the program is being discontinued on April 1, 2017. Upon approval by the Commission, CenturyLink has agreed to notify all customers of the changes to the program through a bill insert; and to send a notice of the changes in the recertification letters which are sent annually to all existing TAP customers. Staff believes that the

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planned outreach efforts by the Company are reasonable. However, Staff believes that the Company should continue to do at least one outreach effort a year informing all residential customers of the availability of the Lifeline and Senior Telephone Discount Programs.

- 16. In Decision No. 68604, \$100,000 was to be allocated to the Community Action Agencies to defer their expenses associated with assisting DES in administering the TAP for the Medically Needy program. According to CenturyLink, the \$100,000 disbursement to the Community Action Agencies was to reimburse them for their costs to enroll qualified applicants based upon the number of TAP applications each agency has processed in the quarter. Although as CenturyLink points out, that disbursement methodology was revised in Decision No. 70489 to allow the use of the existing DES funding formula that was not directly tied to the number of TAP applications processed to simplify the methodology for DES. Nonetheless, according to CenturyLink it did not change the intent behind the \$100,000 which was to provide an "offset" to the administrative costs for the program.
- 17. CenturyLink points out that the disbursement is made on a state fiscal year basis July 1st through June 30th of each year. Since CenturyLink has provided reimbursement through June 30th, the Company states that the most that could be argued is that CenturyLink would be responsible for \$75,000 in further funding until the program is grandfathered. In the materials provided by CenturyLink, at the request of Staff, the Company had reached out to DES and the Community Action Agencies on this issue. Because the Company will continue to process new customers through April 1, 2017, CenturyLink should work with DES and the Community Action Agencies to address any further funding needs up to \$75,000 for the next state fiscal year until the program is grandfathered.
- 18. Finally, when DES was the administrator of the program, it published quarterly reports with information including subscribership levels. Since CenturyLink will now be administering the program in lieu of DES, Staff believes that it would be useful for CenturyLink to file quarterly reports with information on the various programs as discussed in Staff's recommendations below. Staff believes that the reporting should be quarterly to begin with; and then can transition to annual filings.

## D. Staff Recommendations

- 19. Based on its analysis, Staff concludes that CenturyLink's requests, for approval to grandfather the Medically Needy Telephone Assistance Program to existing customers as of April 1, 2017, is reasonable. In addition, CenturyLink's proposal to make the program available to new applicants until April 1, 2017, is also reasonable. Therefore, Staff recommends that the Commission issue an Order approving the proposed tariff revision. The Program will not be offered to new customers after April 1, 2017.
- 20. Staff further recommends that the Company be required to perform outreach efforts to customers meeting eligibility requirements, but who have not yet signed up for the TAP for the Medically Needy program as of April 1, 2017, as described above in Finding of Fact 14. In addition, the Company shall continue to do at least one outreach effort a year which informs all residential customers of the availability of the Lifeline and Senior Telephone Discount Programs.
- 21. Staff recommends that CenturyLink confer with DES and the Community Action Agencies and come to agreement on necessary funding up to a cap of \$75,000 to support the agencies' work on these programs through April 1, 2017 of the next state fiscal year.
- 22. Finally, Staff further recommends that CenturyLink take over the quarterly reporting done by DES, as program administrator. Staff recommends that CenturyLink file quarterly reports for a period of two years from the date of the Commission's Order on this matter which includes any problems encountered by CenturyLink since taking over administration of its TAP programs in Arizona; any continued funding provided to DES and the Community Action Agencies; the level of subscribership by program; quarterly and cumulative costs of administering the program, any outreach efforts undertaken for the TAP for the Medically Needy and the other TAP programs, and any other reporting requirements requested by Staff. After the two year period, Staff recommends that the Company file reports on an annual basis with information on subscription levels.

## **CONCLUSIONS OF LAW**

1. CenturyLink is an Arizona public service corporation within the meaning of Article XV, Section 2, of the Arizona Constitution.

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- 2. The Commission has jurisdiction over CenturyLink and the subject matter of this proceeding.
- 3. Notice of CenturyLink's Application and the Commission Open Meeting was provided in the manner prescribed by law.
- 4. Staff's recommendations regarding the tariff revisions proposed by CenturyLink in its Application discussed above are just and reasonable and in the public interest and should be approved.

### **ORDER**

IT IS THEREFORE ORDERED that Qwest Corporation dba CenturyLink QC's proposed tariff revisions to grandfather the Medically Needy Telephone Assistance Program, to include existing customers as of April 1, 2017, is hereby approved.

IT IS FURTHER ORDERED that Qwest Corporation dba CenturyLink QC's request that no new customers be accepted to enroll into the program on or after April 1, 2017, is also hereby approved.

IT IS FURTHER ORDERED that Qwest Corporation dba CenturyLink QC's request that customers who leave the program for any reason, including but not limited to: failure to re-qualify, failure to recertify, or lapse in service not be accepted back into the program is hereby approved effective April 1, 2017.

IT IS FURTHER ORDERED that Qwest Corporation dba CenturyLink QC shall undertake outreach efforts on its TAP for the Medically Needy program as set forth in Finding of Fact 14. In addition, the Company shall undertake at least one outreach effort every year informing customers of the availability of the Lifeline program and the Senior Telephone Discount Plan.

IT IS FURTHER ORDERED that Qwest Corporation dba CenturyLink QC confer with DES and the Community Action Agencies and come to agreement on necessary funding up to a cap of \$75,000 to support the agencies work on these programs through April 1, 2017.

IT IS FURTHER ORDERED that Qwest Corporation dba CenturyLink QC shall file quarterly reports with the Commission for a period of two years from the date of the Commission's Order on this matter which shall include any problems encountered by Qwest Corporation dba CenturyLink QC since taking over the administration of its TAP programs; the level of continued

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| 1 2 | SERVICE LIST FOR: Qwest Corporation dba Co<br>DOCKET NOS. T-01051B-15-0383 | enturyLink QC  |
|-----|--|--|
| 3   | Mr. Stephen S. Melnikoff   | Mr. Martin Aronson   |
| 4   | General Attorney   | One East Camelback Road, Suite 340                                     |
| 5   | Regulatory Law Office (JALS-RL/IP) Office of the Judge Advocate General    | Phoenix, Arizona 85012   |
| 6   | U.S. Army Legal Services Agency<br>9275 Gunstin Road                       | Mr. Mark DiNunzio  |
| 7   | Fort Belvoir, Virginia 22060   | Cox Communications 1550 West Deer Valley Road                          |
| 8   | MCImetro Access Transmission Services, LLC                                 | MS: DV3-16, Building C<br>Phoenix, Arizona 85027                       |
| 9   | 201 Spear Street, 9 <sup>th</sup> Floor<br>San Francisco, California 94105 | Mr. Albert Sternman  |
| 10  | Ms. Joan S. Burke  | Arizona Consumer Council<br>6841 North 15 <sup>th</sup> Place          |
|     | Law Offices of Joan S. Burke, P.C.   | Phoenix, Arizona 85014   |
| 11  | 1650 N. First Avenue   | 36 D 1 U 7   |
| 12  | Phoenix, Arizona 85003   | Ms. Rochelle Jones<br>Senior Vice President, Regulatory                |
| 13  | Mr. Gary Yaquinto  | tw telecom   |
| 14  | 2100 North Central Avenue, Suite 210<br>Phoenix, Arizona 85004             | 10475 Park Meadows Drive<br>Littleton, Colorado 80124                  |
| 15  | Mr. Jeffrey W. Crockett  | Mr. Norman Curtright   |
| 16  | Crockett Law Group PLLC  | Qwest Corporation  |
| 17  | 1702 East Highland Avenue, Suite 204<br>Phoenix, Arizona 85016             | 3033 North 3 <sup>rd</sup> Street, Room 1010<br>Phoenix, Arizona 85012 |
| 18  | Mr. Michael W. Patten  | Mr. Reed Peterson  |
| 19  | Snell & Wilmer L.L.P. One Arizona Center                                   | Qwest Corporation  |
| 20  | 400 East Van Buren Street, Suite 1900<br>Phoenix, Arizona 85004            | 3033 North 3 <sup>rd</sup> Street, Room 1010<br>Phoenix, Arizona 85012 |
|     | Hochix, Mizolia 65004  | Mr. Brian Thomas   |
| 21  | Mr. Thomas Campbell  | Time Warner Telecom, Inc.  |
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| I   |  |  |

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